

1 District Judge Richard A. Jones  
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UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

10 E.L.A. and O.L.C.,

Case No. C20-1524-RAJ

11 Plaintiffs,

SECOND STIPULATED MOTION FOR  
ORDER OF 60-DAY ABEYANCE

12 v.

13 UNITED STATES OF AMERICA,

NOTE ON MOTION CALENDAR:  
SEPTEMBER 7, 2021

14 Defendant.  
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16 The Parties, by and through the undersigned counsel, jointly stipulate and move the Court  
17 for a second 60-day abeyance of this matter. On July 9, 2021, the Court granted the parties' first  
18 request for a 60-day abeyance. Dkt. No. 26.

19 Since then, the United States and the group of counsel coordinating negotiations on  
20 behalf of plaintiffs and claimants ("Coordinating Counsel") continue to make significant  
21 progress in their effort to settle the district court cases nationwide and pending administrative tort  
22 claims arising from family separations at the U.S./Mexico border that occurred during the prior  
23 administration. During the current stay period, the United States and Coordinating Counsel  
24 continued to meet frequently and narrowed their differences on important elements of the  
25 settlement framework. However, due to the scale and complexity of the settlement effort,  
26 additional time is needed to reach a final agreement. To facilitate these ongoing discussions, the  
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1 parties jointly request that this action, including all proceedings and case deadlines, be held in  
2 abeyance for an additional 60 days.

3 Therefore, the parties stipulate and agree that good cause exists for an Order:

- 4 1. Holding this matter in abeyance for 60 days until November 8, 2021;  
5 2. That, if this matter is not settled by November 8, 2021, the parties will jointly  
6 update the Court and either seek an additional abeyance or continue the litigation.

7 Respectfully submitted,

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15 **NORTHWEST IMMIGRANT RIGHTS  
16 PROJECT**

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Attorneys for the United States

## ORDER

## IT IS SO ORDERED.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

The Honorable Richard A. Jones  
United States District Judge